

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

CINDY L. RIGG,

Plaintiff,

v.

COUNTY OF DAUPHIN,
DAUPHIN COUNTY SHERIFF'S
DEPARTMENT, and
RALPH MCALLISTER

Defendants.

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: CIVIL NO. 4:CV-01-0967
: JUDGE RAMBO
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FILED
HARRISBURG

JAN 11 2002

MARY E. D'ANDREA, CLERK
Per [Signature]
~~DEPUTY CLERK~~

MOTION TO WITHDRAW AS COUNSEL

AND NOW, Michael J. Kane, Attorney for Defendant Ralph McAllister, moves this court for leave to withdraw as counsel, and states in support thereof:

1. Counsel has left the private practice of law and been appointed to a position with the Commonwealth of Pennsylvania.
2. In counsel's new position, he is not permitted to maintain a private law practice
3. Counsel has arranged for Ralph E. Godfrey, Esq. to enter his appearance on behalf of Defendant McAllister and to assume all responsibilities for the representation.
4. I am authorized to state to the court that Mr. McAllister concurs in this Motion.

WHEREFORE, Counsel requests that he be released from further representation.

Respectfully submitted,

[Signature]
Michael J. Kane
3902 Golfview Dr.
Mechanicsburg, PA 17050
(717) 728-0707

CERTIFICATE OF SERVICE

I Michael J. Kane, hereby certify that, on the 2nd day of January, 2002, I placed true and correct copies of the

MOTION TO WITHDRAW AS COUNSEL

in the United States Mail, first class postage prepaid and addressed to:

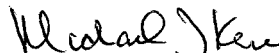
Spero T. Lappas, Esq
205 State Street
P.O. Box 808
Harrisburg, PA 17108

James D. Young, Esq.
Lavery Faherty Young and Patterson, PC
The Kunkle Building
301 Market St, Suite 800
P.O. Box 1245
Harrisburg, PA 17108-1245

Michael J Kane
Michael J. Kane

CERTIFICATE OF CONCURRENCE

I, Michael J. Kane, hereby certify that I have contacted Spero Lappas, Esq., attorney for Plaintiff and Frank Lavery, Esq., attorney for defendants Dauphin County and Dauphin County Sheriff Department> Mr. Lappas concurs in the motion and I was unable to reach Mr. Lavery, but presume he has no objection.



Michael J. Kane